

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

CLERK'S OFFICE U.S. DIST. COURT  
AT HARRISONBURG, VA  
FILED  
*in open court*  
JUN 15 2016  
JULIA C. DUDLEY, CLERK  
BY: *[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA, )

vs. )

KEVIN ALAIN COELLO-GALEANO )

Criminal No: 5:13CR23-003

**STATEMENT OF FACTS**

The United States herein submits the following statement of facts in support of the defendants guilty plea to Count Two of the Indictment, charging a violation of 18 U.S.C. § 2422(a) and § 371.

During the time of the conspiracy as alleged in Count Two of the indictment (From no later than November 2010 to August 19, 2011), the defendant, Kevin Alain Coello-Galeano, Mario Ranirez-Larios, Yacaris Frias-De-Los Santos, Elin Coello-Ordonez (hereinafter "Elin") and others conspired to knowingly persuade, induce, entice or coerce women to travel in interstate commerce for the purpose of engaging in prostitution, and did aid and abet each other in so doing.


Several months prior to the time of the conspiracy, defendant Elin (the defendant's cousin) illegally smuggled an 18 year old woman (Jane Doe #1) from Honduras to the United States after convincing her that he was her boyfriend and had a job waiting for her in Harrisonburg. However, once Jane Doe #1 arrived in Harrisonburg, she soon found out there was no job waiting for her and Elin beat her until she agreed to work for him as a prostitute. Over the course of the next 9 months, Elin transported Jane Doe #1 to a number of different brothels in Virginia, Maryland, Pennsylvania

and Washington D.C. Customers were charged \$30 for every fifteen minutes of sex

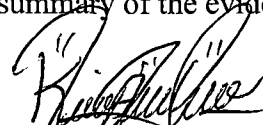

On April 4, 2011, Elin drove Jane Doe #1 from Harrisonburg, Virginia to Hyattsville, Maryland to work as a prostitute at an apartment acting as a brothel. Jane Doe #1 had worked at this apartment 4-5 times earlier. Present at the apartment was the defendant who worked as a doorman, collecting money and handing customers checkers, which they would present to Jane Doe #1 as evidence that they had paid. On April 5, 2011, Jane Doe #1 had been working as a prostitute at the apartment one day. After receiving complaints from neighbors, police raided the apartment. Police seized cash, KY jelly, assorted colored checkers, auto detail business cards and a notebook. Inside the notebook was a piece of paper with letters and numbers. The letters stood for Spanish days of the week and the figures for the number of customers for that day. Police also recovered a number of business cards labeled "Ricky's DJ Auto detailing" with the phone number 240-752-3563. The business cards were fake and handed out on the street to potential customers who would call the number for directions to the brothel. According to Jane Doe #1, the telephone number on the cards belonged to a cell phone the defendant possessed. While police were at the scene, six men showed up at the apartment. When police spoke with the defendant, he initially claimed that Jane Doe #1 was his girlfriend, but later admitted that she was a prostitute and he was the doorman who ran the brothel for a man named "Freddy". Police seized cell phones of the defendant and Jane Doe #1. In Jane Doe's cell phone contact list, the number 540-236-4119 was found under the name "Mi Amor1" (My Love1). This was the cell phone number for Elin and was also found in the cellphone of a prostitute and doorman at a brothel in Harrisonburg, Virginia.

All of the events described herein took place within the Western District of Virginia and elsewhere.

DATED: June 15, 2016

  
CRAIG J. JACOBSEN  
Assistant United States Attorney

I have reviewed the above Statement of Facts in this case and agree that it is an accurate summary of the evidence against me and of my culpability in this case.

  
Kevin Alain Coello-Galeano  
Defendant  
Darren Bostic, Esq.  
Counsel for Defendant